

EXHIBIT NO. 3

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA

3 CASE NO. 2:23-cv-09412 CBM(AGR)

4 D.S., a minor by and through his
5 guardian ad litem Elsa Acosta,
6 individually and as successor-in-interest to
7 William Salgado; C.S., a
8 minor by and through his guardian ad
9 litem Elsa Acosta, individually and as
10 successor-in-interest to William
11 Salgado; J.S., a minor by and through
12 her guardian ad litem Elsa Acosta,
13 individually and as successor-in-interest to
14 William Salgado; M.S., a
15 minor by and through her guardian ad
16 litem Elsa Acosta, individually and as
17 successor-in-interest to William
18 Salgado,

19 Plaintiffs,

20 v.

21 CITY OF HUNTINGTON PARK;
22 NICK NICHOLS; RENE REZA;
23 MATTHEW RINCON; APRIL
24 WHEELER; and DOES 5 through 10,
25 inclusive,

26 Defendants.

27 TELECONFERENCE
28 DEPOSITION OF JUANA MARIA MIRANDA

29 January 9, 2025

30 STENO

31 Aventura, Florida 33180
32 10:03 a.m. - 11:30 a.m.

33
34
35 Melanie Stinson-Konstantinidis, RPR
36 Registered Professional Reporter

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1 A P P E A R A N C E S:

2 On behalf of the Plaintiff:
3 BENJAMIN LEVIN, ESQUIRE
LAW OFFICES OF DALE K. GALIPO
4 21800 Burbank Boulevard, Suite 310
Woodland Hills, California 91367
5 valentine@galipolaw.com

6 On behalf of the Plaintiff:
7 CHRISTOPHER L. HOLM, ESQUIRE
CARRAZCO LAW, APC
8 18301 Irvine Boulevard
Tustin, California 92780
9 hendolaw@gmail.com

10 On behalf of the Defendant:
11 ROGER A. COLVIN, ESQUIRE
ALVAREZ-GLASMAN & COLVIN
12 13181 Crossroads Parkway North
Suite 400 - West Tower
City of Industry, California 91746
13 rcolvin@agclawfirm.com

14

15

16

17

18

19

20

21

22

23

24

25

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1 Thereupon:

2 GIULIANA MOLINA,
3 was duly sworn to truthfully and faithfully
4 interpret all questions posed to the witness,
5 and all answers given by the witness:

6 THE INTERPRETER: My name is Giuliana
7 Molina and my certification number is
8 301448. When the interpreter's oath was
9 administered to me, I presented my
10 interpreter's badge with my photo ID to all
11 parties in this proceeding.

12 P R O C E E D I N G S

13 - - -

14 Deposition taken before MELANIE
15 STINSON-KONSTANTINIDIS, RPR, Registered
16 Professional Reporter and Notary Public in and for
17 the State of Florida at Large, in the above cause:
18 Whereupon,

19 JUANA MARIA MIRANDA,
20 having been sworn in, testified as follows:

21 DIRECT EXAMINATION
22 BY MR. COLVIN:

23 Q. Good morning. Could you please state
24 your full name for the record?

25 A. I didn't hear you.

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1 Q. Could you please state your full name
2 for the record?

3 A. Juana Miranda. Juana M. Miranda.

4 Q. Thank you. Have you ever been known
5 by any other name?

6 A. Never.

7 Q. What is your date of birth, please?

8 A. June 24, 1945.

9 Q. Ms. Miranda, my name is Roger Colvin.
10 I represent Huntington Park in this case. I'll
11 be here this morning to take your deposition.

12 Have you ever had your deposition
13 taken before?

14 A. Never.

15 Q. Before we proceed with the ground
16 rules for the deposition, I just want to
17 reiterate we have provided a Spanish interpreter
18 for you this morning, so I would request that
19 all your responses to any questions from any
20 lawyer be in Spanish and not part Spanish and
21 part English but Spanish only, please. Do you
22 understand that?

23 A. Okay.

24 Q. Thank you. Ms. Miranda, the reporter
25 has administered to you an oath to tell the

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1 Q. How long have you been living at this
2 address in Fontana?

3 A. Four years.

4 Q. Is this an apartment or a house?

5 A. House.

6 Q. What is your relationship with William
7 Rene Salgado Miranda?

8 A. I'm his grandma. And I raised him as
9 a 40-days old.

10 Q. Raised him from when?

11 A. As a 40-day-old.

12 Q. Why did you raise him at 40-days old?

13 A. Because his dad was working in
14 different state and his mom left him with me
15 when he was 40-days old.

16 Q. Do you know the name of the mother who
17 left William with you when he was 40-days old?

18 A. She already died. I don't know. I
19 don't recall.

20 Q. Do you know when she died?

21 A. No, I don't recall. I was already
22 living in the US. I had been living here for
23 seven years.

24 THE INTERPRETER: Counsel, please
25 remind the witness to not speak at the same

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1 time of the interpreter. I'm having a hard
2 time hearing her, if I am speaking also.

3 Mr. Colvin, would you mind?

4 MR. COLVIN: Yes. Please instruct the
5 witness.

6 MR. HOLM: Is that okay. Do you
7 understand?

8 THE WITNESS: Yes, yes. I do, yes.

9 BY MR. COLVIN:

10 Q. When you received William when he was
11 40-days old, where were you residing at that
12 time?

13 A. I didn't hear you.

14 Q. Where were you living at the time you
15 accepted William when he was 40-days old, what
16 country were you living in?

17 A. In Nicaragua, yes.

18 Q. Do you know William's date of birth?

19 A. Yes, of course. November 1991. I
20 don't recall anymore.

21 Q. Do you know who the biological father
22 of William is or was?

23 A. William Omar Castillo Miranda.

24 Q. What relationship do you have with
25 William Omar Castillo Miranda?

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1 A. He's my biological son.

2 THE INTERPRETER: Counsel, I wold like
3 to mention that there is an audio problem
4 on the witness' side. It's glitchy, it's
5 cutting off at times, so I'm having her
6 repeat herself. I'm sure you can hear it,
7 too.

8 MR. COLVIN: Do you want to keep
9 proceeding or do you want to see --

10 THE INTERPRETER: No, no. I'm just
11 letting you know why I'm taking the liberty
12 of asking her to repeat herself because I
13 usually wouldn't do that, but I'm having
14 trouble hearing it, hearing completely what
15 she's saying.

16 MR. COLVIN: Okay.

17 BY MR. COLVIN:

18 Q. What year did you arrive in the
19 United States?

20 A. Who?

21 Q. You.

22 A. I don't recall. I don't recall.

23 Q. When you arrived in the United States,
24 were you taking care of William at that time you
25 arrived here?

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1 him.

2 Q. I'm sorry. I wouldn't visit him or I
3 would visit him?

4 A. I would not visit him.

5 Q. Why would you not visit him?

6 A. I wouldn't visit him because I didn't
7 want to meddle in his business.

8 Q. At any time after William Salgado,
9 your grandson, moved out after he turned 18, did
10 you know any of the addresses where he resided?

11 A. No, I don't.

12 Q. Did you ever adopt William Salgado,
13 your grandson?

14 A. That's right. I adopted him, so he
15 would not be left without documents.

16 Q. What do you mean, so he would not be
17 left without documents?

18 MR. HOLM: Objection, calls for
19 speculation.

20 THE INTERPRETER: Counsel, the
21 interpreter needs to inquire, please.

22 MR. HOLM: Okay.

23 THE WITNESS: I adopted him, so that
24 he would have a birth certificate.

25

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1 MR. HOLM: Vague as to "son."

2 THE WITNESS: I don't know anything.

3 MR. HOLM: I am objecting, vague.

4 Phrased as to the word "son."

5 BY MR. COLVIN:

6 Q. When I say William Salgado, I'm only
7 referring to your grandson. Do you understand
8 that?

9 A. Okay.

10 Q. To your knowledge did your grandson,
11 William Salgado, have any brothers or sisters?

12 A. I don't know. From his dad's side he
13 did, but not on his mom's.

14 Q. On his dad's side, do you know the
15 names of William, your grandson's siblings?

16 A. Yes.

17 Q. What are their names?

18 A. Omar, Carla and Oscar.

19 Q. With regard to Omar, Oscar and Carla,
20 do you know who their biological father is?

21 A. Yes.

22 Q. Who was that?

23 A. William Omar Castillo Miranda.

24 Q. Do you know who the biological mothers
25 are for Oscar, Omar and Carla?

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1 at times?

2 A. Yes, when he didn't have a job.

3 Q. How would you know that?

4 A. Because he would tell me.

5 Q. What would he tell you?

6 A. That he wasn't working that day. He
7 would tell me when he wasn't working.

8 Q. Did you talk to your grandson, William
9 Salgado, after he left at 18, did you talk to
10 him every single day after he left?

11 A. Yes.

12 Q. To your knowledge after he left at age
13 18, did he have a cell phone?

14 A. Yes, I bought it for him.

15 Q. Did you have a cell phone at any time
16 after he left at age 18, William Salgado?

17 A. Yes.

18 Q. Back in October of 2022, where were
19 you residing?

20 A. In Fontana.

21 Q. The same address you live at today,
22 correct?

23 A. Yes.

24 Q. During the year 2022, did your
25 grandson, William, ever pay your rent?

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1 your grandson, was living back in October of
2 2022?

3 A. Huntington Park, but I don't recall
4 the address.

5 Q. Do you know with whom he was residing
6 with in Huntington Park back in October of 2022?

7 A. Yes.

8 Q. Who was that?

9 A. With his dad, William Omar, Guadalupe,
10 the wife, and the Oscar.

11 Q. Whose wife?

12 A. William Omar's.

13 Q. Were you at the location on or about
14 October 30, 2022, when William was shot?

15 A. No.

16 Q. Did you witness the shooting of your
17 grandson, William, at all that day?

18 A. No, I wasn't there.

19 Q. Did you find out that William Omar was
20 shot that day?

21 A. No, not until the following day.

22 Q. How did you find out the following day
23 that william was shot?

24 A. Because his dad called me.

25 Q. What did his dad tell you when he

JUANA MARIA MIRANDA
JANUARY 09, 2025

JOB NO. 1379423

1

2 CERTIFICATE OF OATH

3 THE STATE OF FLORIDA

4 COUNTY OF MIAMI-DADE

5

6 I, the undersigned authority, certify that
7 JUANA MARIA MIRANDA personally appeared before me
8 and was duly sworn.

9

10 WITNESS my hand and official seal this
11 13th day of January, 2025.

12

13

14

15

16

Melanie Stinson-Konstantinidis

17

MELANIE STINSON-KONSTANTINIDIS, RPR,
REGISTERED PROFESSIONAL REPORTER
Notary Public - State of Florida
My Commission Expires: 5/22/2025
My Commission No.: HH116638

18

19

20

21

22

23

24

25